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Not a Partnership or Professional Corporation
All Attorneys are Employees of The Travelers Indemnity
Company and its Property Casualty Affiliates

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TELEPHONE: (985) 727-3411
FACSIMILE: (888) 341-6954

March 30, 2021

Clerk of Court
1st JDC, Parish of Caddo
501 Texas St., Room 103
Shreveport, LA 71101

Re: *Angela Wilson v. CIK Beauty Supply, Inc., et al*
Suit No. 628919, Div. "C"; 1st JDC, Parish of Caddo
Our File No. 2021033553
Claim No. FRV3776

Dear Clerk:

Please provide me with a certified copy of this entire suit record. I enclose my firm's check in the amount of **\$18.00** to cover the costs associated with this request.

With kindest regards, I remain,

Sincerely,

MARICLE & ASSOCIATES

/s/ Stacey Smith Melerine

Stacey Smith Melerine

SSM/jmk
Enclosure

MARICLE & ASSOCIATES

APR 08 2021

RECEIVED
MANDEVILLE

We strive to be a paperless office. I encourage you to send all correspondence and every other transmittable item via email or fax instead of US mail when at all possible. When this form of transmittal occurs, it is not necessary to send a separate copy via US mail.
This request applies to all attorneys and staff with Maricle & Associates.

Exhibit "A"

ANGELA WILSON

DOCKET NO: 628919-C

VERSUS

1st JUDICIAL DISTRICT COURT

CIK BEAUTY SUPPLY, INC. DBA
ARMSTRONG McCALL PROFESSIONAL
BEAUTY SUPPLY AND THE
TRAVELERS INDEMNITY COMPANY

CADD O PARISH, LOUISIANA

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes Angela Wilson, a resident of the full age of majority of the Parish of Caddo, State of Louisiana, who respectfully represents:

1.

Made defendant herein are:

- a. CIK BEAUTY SUPPLY, INC. DBA ARMSTRONG MCCALL PROFESSIONAL BEAUTY SUPPLY, a foreign corporation authorized to do and doing business in the State of Louisiana who can be served via Louisiana long arm statute via William Spore, 3950 Highway 360, Suite 102, Grapevine, TX 76051; and
- b. THE TRAVELERS INDEMNITY COMPANY, a foreign insurance company authorized to do and doing business in the state of Louisiana who has appointed the Louisiana Secretary of State, R. Kyle Ardoin, 8585 Archives Avenue, Baton Rouge, LA 70809.

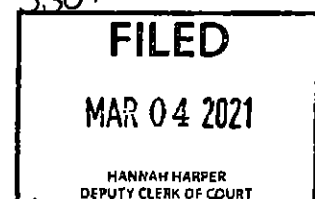
2.

On December 11, 2020, CIK Beauty, Inc., owned, operated or otherwise had the care, custody, and control of Armstrong McCall Professional Beauty Supply located at 3351 Youree Drive, Shreveport, Caddo Parish, Louisiana.

3.

At all times pertinent herein, there was in full force and effect between the Travelers Indemnity Company and CIK Beauty, Inc. dba Armstrong McCall Professional Beauty Supply, a policy of liability insurance under the terms, condition and provisions of which the Travelers Indemnity Company, assumed liability for damages such as sued for herein by Plaintiff.

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CC 3 CP ✓ MAIL ✓ N/D ✓
INDEX 4 REC ✓ FAX ✓
W/D DOC ✓ CERT MAIL ✓
SERVICE 3 cit



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Dudley

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4.

On or about December 11, 2020, Plaintiff, Angela Wilson, was a customer of CIK Beauty Supply, Inc., dba Armstrong McCall Professional Beauty Supply located at 3351 Youree Drive, Shreveport, Caddo Parish, Louisiana (hereinafter "Armstrong").

5.

Plaintiff, Angela Wilson, had entered Armstrong to make some purchases.

6.

As Plaintiff, Angela Wilson, approached a register to purchase her items, she slipped and fell on water that was on the floor.

7.

The condition of the floor was unreasonably dangerous and Armstrong through it's employees, either knew of the condition or should have known of the condition.

8.

Prior to falling, there were no warning signs, mats, devices, or other notice to Angela Wilson, warning her of the hazardous condition posed by the water on the floor.

9.

The above described fall and resulting injuries and damages were caused by the negligence, fault or strict liability of Armstrong in the following non-exclusive respects:

- a. By failing to maintain the premises in a safe condition;
- b. By failing to warn plaintiff of the unsafe and unreasonably dangerous condition;
- c. By failing to inspect the area and/or remove such hazards that caused plaintiff's fall;
- d. By failing to remedy the unreasonably dangerous condition;
- e. By failing to implement policies and procedures on keeping areas clean;
- f. By failing to implement policies and procedures on keeping areas free of hazardous conditions;
- g. By failing to properly train and supervise its employees regarding policies and procedures on keeping areas clean and free of hazardous conditions; and
- h. By failing to prevent plaintiff from entering into what defendant knew or should have known was an unsafe area.

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10.

As a result of this fall, Plaintiff, Angela Wilson, has sustained the following non-exclusive elements of damages:

- a. Physical pain, suffering, and anguish (past, present, and future);
- b. Mental anguish (past, present, and future);
- c. Loss of enjoyment of life (past, present, and future);
- d. Disfigurement and disability;
- e. Medical expenses (past, present, and future);
- f. Lost wages (past, present, and future); and
- g. Loss of earning capacity;
- h. Neck pain;
- i. Low back pain;
- j. Bilateral leg pain;
- k. Shoulder pain; and
- l. Bilateral knee pain.

11.

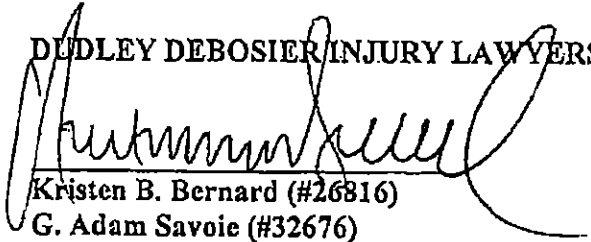
Plaintiff's claims exceed the requisite amount for a trial by jury.

WHEREFORE, Plaintiff, Angela Wilson, prays that defendant be duly served and cited to appear and answer this Petition, and after the expiration of all legal delays and due proceedings are had, that there be a judgment rendered herein in favor of plaintiff and against defendant, CIK Beauty Supply, Inc., dba Armstrong McCall Professional Beauty Supply and The Travelers Indemnity Company, jointly, severally, and in solido, for all items of special damages incurred by plaintiff and such general damages as are reasonable in the premises, together with legal interest from the date of judicial demand until paid, all costs of this proceeding, and all such other and equitable relief to which plaintiff may be entitled.

SCAN030820210000000305

Respectfully Submitted:

DUDLEY DEBOSIER INJURY LAWYERS


Kristen B. Bernard (#26816)

G. Adam Savoie (#32676)

4300 Youree Drive, Suite 250

Shreveport, Louisiana 71105

Phone: (318) 216-4417

Fax: (318) 670-7417

Attorneys for Plaintiff

SCAN03082021000000306

PLEASE SERVE:

CIK BEAUTY SUPPLY INC., DBA ARMSTRONG MCCALL PROFESSIONAL BEAUTY
SUPPLY

Via Louisiana Long Arm Statute

Through Their Agent for Service of Process

William Spore

3950 Highway 360, Suite 102

Grapevine, TX 76051

And

1671 South Interstate 35, Suite 308

New Braunfels, TX 78130

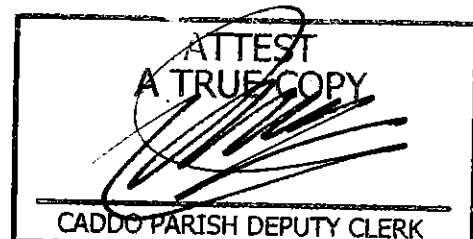
THE TRAVELERS INDEMNITY COMPANY

Through the Secretary of State

R. Kyle Ardoin

8585 Archive Avenue

Baton Rouge, LA 70809



ANGELA WILSON

DOCKET NO:

VERSUS

1st JUDICIAL DISTRICT COURT

CIK BEAUTY SUPPLY, INC. DBA
ARMSTRONG McCALL PROFESSIONAL
BEAUTY SUPPLY AND THE
TRAVELERS INDEMNITY COMPANY

CADDO PARISH, LOUISIANA

**INTERROGATORIES AND REQUEST FOR PRODUCTION
PROPOUNDED BY PLAINTIFFS TO DEFENDANTS, CIK BEAUTY SUPPLY, INC.
DBA ARMSTRONG McCALL PROFESSIONAL BEAUTY SUPPLY AND THE
TRAVELERS INDEMNITY COMPANY**

YOU ARE REQUESTED AND REQUIRED to answer the following interrogatories and requests for production propounded to you by the plaintiffs. Your answers must be full, complete, categorical, in writing and under oath, and filed in the record of this suit, with a copy served upon the undersigned attorney for plaintiffs within thirty (30) days after service hereof.

When the phrase "accident" or "injury" or "incident" or other similar phrases are used in these interrogatories, it refers to the accident referred to in the petition.

You are further placed on notice that these interrogatories and requests for production are deemed continuing interrogatories, requiring supplemental answers thereto in the event relevant information which would require amendment or supplementation of the answers to these interrogatories in order that they would be properly and truthfully answered, is discovered, acquired by, or becomes known to you.

In answering the following interrogatories, please furnish such information as is available to you, not merely information you now have of your own personal knowledge. This means you are to furnish information which is in the possession of any of your agents or attorneys or otherwise subject to your custody or control.

If you cannot answer any of these interrogatories in full, please answer to the extent possible, specifying the reason for your inability to answer the remainder, and stating whatever information or knowledge you have concerning the unanswered portion.

INTERROGATORY NO. 1:

Please state the name, address, job title and employer of each person answering or contributing to the answers to these interrogatories and state whether each such individual prior to answering these interrogatories made due and diligent search of all books, records and papers of the defendants and made inquiry of knowledgeable agents and employees of the defendants with a view toward obtaining all available information in this action.

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INTERROGATORY NO. 2:

State the name, address, job title and employer of each person who has records pertaining to the area where ANGELA WILSON fell in the store and at the time described in the Petition for Damages.

INTERROGATORY NO. 3:

Please state the names and addresses of the persons or entities which owned the property described in the Petition for Damages.

INTERROGATORY NO. 4:

Please state the name and address of all individuals or entities which leased the premises described in the Petition for Damages.

REQUEST FOR PRODUCTION NO. 1:

Please produce all leases which were in existence on date and place described in the Petition for Damages.

INTERROGATORY NO. 5:

Please list all insurance policies and their limits which included liability coverage applicable to the store described in the Petition for Damages.

REQUEST FOR PRODUCTION NO. 2:

Please produce certified copies of each of the insurance policies identified in your response to the above interrogatory.

INTERROGATORY NO. 6:

Please list the names and current addresses and telephone numbers of all persons who witnessed or otherwise have knowledge of ANGELA WILSON's fall described in the Petition for Damages, or of the condition of said store on that date including any foreign substance on the floor and the composition, maintenance and upkeep of the floor.

INTERROGATORY NO. 7:

Please state the names and addresses of all persons from whom statements have been taken pertaining to ANGELA WILSON's accident or the condition of the floor where she fell as described in the Petition for Damages and indicate as to each statement the date it was taken, by whom it was taken, whether it was written or recorded and in whose possession a copy of said statements might be presently be found.

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INTERROGATORY NO. 8:

Please state the name and address, employer and job title of the individual in charge of maintenance, cleaning and/or repairs to the floor described in the Petition for Damages.

INTERROGATORY NO. 9:

Please state the name of the individual or entity who possesses records of repairs, cleaning and maintenance of the floor of the store described in the Petition for Damages.

REQUEST FOR PRODUCTION NO. 3:

Please produce all records pertaining to repairs, cleaning or maintenance of the floor of the store described in the Petition for Damages for 1 year prior to the date of the accident until 1 month after.

INTERROGATORY NO. 10:

Please state whether an accident or incident report was prepared following the accident of ANGELA WILSON described in the Petition for Damages.

REQUEST FOR PRODUCTION NO. 4:

Please produce copies of all accident or incident reports prepared following the incident described in the Petition for Damages.

INTERROGATORY NO. 11:

Please state whether you or your representatives possess any photographs, plats, drawings, videotapes or other images or depictions showing the floor where ANGELA WILSON fell.

INTERROGATORY NO. 12:

If your answer to the above interrogatory is affirmative, please list all of the items indicating who took or prepared them, what each depicts or portrays, when they were taken or made and in whose possession copies may presently be found.

REQUEST FOR PRODUCTION NO. 5:

Please produce copies of all items identified in your response to interrogatory number 11.

INTERROGATORY NO. 13:

Please state the names and addresses of all expert witnesses with whom you have consulted in connection with this suit and with respect to each, state the facts and materials presented to said experts and the opinions expressed by said experts. Please indicate whether reports have been rendered by said experts and if so, the date of the reports and the persons presently in possession of same.

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INTERROGATORY NO. 14:

Please list all accidents or incidents which have occurred in which persons tripped or fell in the store described in the Petition for Damages. In connection with this inquiry, please list the dates of said incidents, the person/persons involved along with their address and phone number and the name, address and phone number of their legal representative, if any, and the name and address of the individual who maintains a file including this information.

INTERROGATORY NO. 15:

Please state whether you are aware of any complaints being made prior to the date of ANGELA WILSON's fall relating to a foreign substance being on the floor described in the Petition for Damages.

INTERROGATORY NO. 16:

Did you make any alterations or changes in the flooring of the store subsequent to the date of ANGELA WILSON's injury?

INTERROGATORY NO. 17:

If your answer to the preceding interrogatory is affirmative, please state the date of each change or alteration, a description of each change or alteration, the reasons such changes or alterations were made, the name, title and address of the person or persons making the change or alteration, the name, title and address of the person or persons authorizing the change or alteration and the name, title and address of each person who has custody of the records pertaining to the change or alteration.

INTERROGATORY NO. 18:

On December 11, 2020, who was responsible for the maintenance, inspection, cleaning and repair of the floor in the store described in plaintiff's petition? Please list by name and last known address and phone number.

INTERROGATORY NO. 19:

Please state whether you had any established procedure for the regular inspection and cleaning, or cleaning at any other time, of the store floor where the accident happened.

INTERROGATORY NO. 20:

If your answer to the preceding interrogatory is affirmative, please state the following:

- (a) describe the procedure;
- (b) state the date on which the last inspection was made prior to the occurrence of

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ANGELA WILSON's fall;

- (c) identify the name, job title and address of the persons participating in said inspections;
- (d) state in detail what the inspections revealed or disclosed; and
- (e) state the name of the individual responsible for maintaining the files on these inspections.

REQUEST FOR PRODUCTION NO. 6:

Please produce copies of all inspection reports or information relating to your response to the above interrogatory. If any procedure is identified above, and it is in any training manual, handbook, training film or anything else provided to any employee, please produce a copy.

INTERROGATORY NO. 21:

Please state whether you or anyone engaged by you have conducted any surveillance of ANGELA WILSON subsequent to December 11, 2020.

INTERROGATORY NO. 22:

If your answer is affirmative, please state the name, address, employer and job title of each person participating in the surveillance, each date and time on which surveillance was made, whether logs were kept pertaining to the surveillance and whether films, photographs or recordings exist in connection with said surveillance.

REQUEST FOR PRODUCTION NO. 7:

Please produce all logs, photographs, recordings, videotapes or other physical data pertaining to said surveillance.

INTERROGATORY NO. 23:

Please state the names and addresses of all witnesses you intend to call at the trial of this case and with respect to each give a summary of the substance of their anticipated testimony.

INTERROGATORY NO. 24:

Please describe all physical evidence in your possession related to this incident.

REQUEST FOR PRODUCTION NO. 8:

Please produce said physical evidence for inspection or copying.

REQUEST FOR PRODUCTION NO. 9:

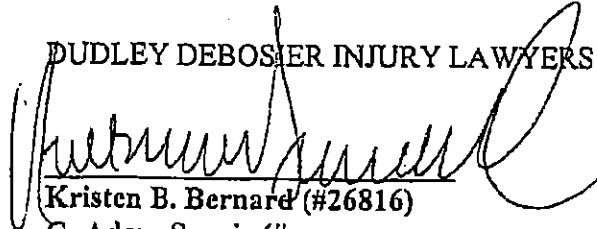
Please produce any and all operations and procedures manuals or other written instructions pertaining to the maintenance, repair or upkeep of the store where ANGELA WILSON fell.

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These interrogatories shall be deemed continuing so as to require supplemental answers if defendants obtain further information between the time the answers are served and the time of the trial.

You are required to make a full and complete disclosure in the premises with respect to each of the above and foregoing interrogatories.

DUDLEY DEBOSIER INJURY LAWYERS



Kristen B. Bernard (#26816)

G. Adam Savoie (#

4300 Youree Drive, Suite 250

Shreveport, Louisiana 71105

Phone: (318) 216-4417

Fax: (318) 670-7417

Attorneys for Plaintiff

PLEASE SERVE WITH PETITION

SCAN03082021000000312

karam

CPCC.CV.2471373

Citation

ANGELA WILSON
VS
CIK BEAUTY SUPPLY INC DBA ETAL

NO. 628919- C
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: TRAVELERS INDEMNITY COMPANY
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within FIFTEEN (15) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within FIFTEEN (15) days, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date March 5, 2021.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

- REQUEST FOR ADMISSIONS OF FACTS
- XX INTERROGATORIES
- XX REQUEST FOR PRODUCTION OF DOCUMENTS

By: _____
Deputy Clerk

KRISTEN B BERNARD - 7311
Attorney

SCAND03082021000000313

FILE COPY

karam

CPCC.CV.2471415

Long-Arm Citation

ANGELA WILSON
VS
CIK BEAUTY SUPPLY INC DBA ETAL

NO. 628919 – C
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: CIK BEAUTY SUPPLY INC DBA ARMSTRONG MCCALL
PROFESSIONAL BEAUTY SUPPLY

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REQUEST FOR ADMISSIONS OF FACTS

XX INTERROGATORIES

XX REQUEST FOR PRODUCTION OF DOCUMENTS

By: _____

Deputy Clerk

KRISTEN BERNARD

Attorney

FILE COPY

SCAN030820210000000314

karam

CPCC.CV.2471423

Long-Arm Citation

ANGELA WILSON
VS
CIK BEAUTY SUPPLY INC DBA ETAL

NO. 628919 – C
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: CIK BEAUTY SUPPLY INC DBA ARMSTRONG MCCALL
PROFESSIONAL BEAUTY SUPPLY

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XX INTERROGATORIES

XX REQUEST FOR PRODUCTION OF DOCUMENTS

By: _____

Deputy Clerk

KRISTEN BERNARD - 7311

Attorney

FILE COPY

SCAN030826210000000315

ANGELA WILSON

DOCKET NO: 628919-C

VERSUS

1st JUDICIAL DISTRICT COURT

CIK BEAUTY SUPPLY, INC. DBA
ARMSTRONG McCALL PROFESSIONAL
BEAUTY SUPPLY AND THE
TRAVELERS INDEMNITY COMPANY

CADDO PARISH, LOUISIANA

REQUEST FOR NOTICES

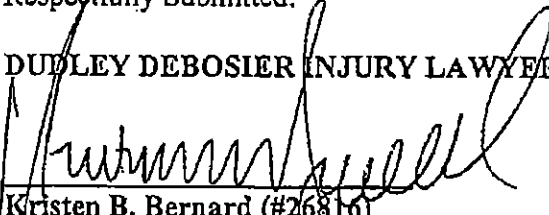
To: Honorable Mike Spence
1st Judicial District Court of Caddo Parish
501 Texas Street, #103
Shreveport, LA 71101

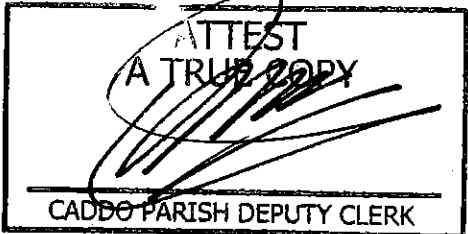
In accordance with Louisiana Code of Civil Procedure Article 1572, you are hereby requested to give us notice by mail ten (10) days in advance of the date fixed for trial or hearing of this case, whether on exceptions, motions, rules, or the merits.

We also request immediate notice of all orders or judgments, whether interlocutory or final, made or rendered in this case upon the rendition thereof as provided by Louisiana Code of Civil Procedure Articles 1913 and 1914, including notice of judgment in the event this case is taken under advisement, or if the judgment is not signed at the conclusion of the trial.

Respectfully Submitted:

DUDLEY DEBOSIER INJURY LAWYERS


Kristen B. Bernard (#26816)
G. Adam Savoie (#32676)
4300 Youree Drive, Suite 250
Shreveport, Louisiana 71105
Phone: (318) 216-4417
Fax: (318) 670-7417
Attorneys for Plaintiff



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CC CP MAIL N/D
INDEX REC FAX
W/D DOC CERT MAIL
SERIAL

SCAN03052021000000485

Citation

ANGELA WILSON
VS
CIK BEAUTY SUPPLY INC DBA ETAL

NO. 628919- C
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: TRAVELERS INDEMNITY COMPANY
8585 ARCHIVES AVENUE
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REQUEST FOR ADMISSIONS OF FACTS

XX INTERROGATORIES

XX REQUEST FOR PRODUCTION OF DOCUMENTS

By:

Deputy Clerk

KRISTEN B BERNARD - 7311

Attorney

SERVICE INFORMATION:

Date

Personal Domiciliary to

Unserved because

Remarks

Deputy Sheriff

FILED
SHERIFF RETURN

MAR 30 2021

MIKE SPENCE

CLERK OF COURT

made service on the named party
by tendering a copy of this document on this day

MAR 19 2021

K. Dargatzis, Legal
By: J. Shan 2440
Deputy Sheriff, Parish of East Baton Rouge, LA